

1 **SOED**  
2 **LOREN S. YOUNG, ESQ.**  
3 Nevada Bar No. 7567  
4 **JULIE A. FUNAI, ESQ.**  
5 Nevada Bar No. 8725  
6 **LINCOLN, GUSTAFSON & CERCOS, LLP**  
7 *ATTORNEYS AT LAW*  
8 7670 W. Lake Mead Blvd., Suite 200  
9 Las Vegas, Nevada 89128  
10 Telephone: (702) 257-1997  
11 Facsimile: (702) 257-2203  
12 [lyoung@lgclawoffice.com](mailto:lyoung@lgclawoffice.com)  
13 [jfunai@lgclawoffice.com](mailto:jfunai@lgclawoffice.com)

14 Attorneys for Defendant, TARGET CORPORATION

15 UNITED STATES DISTRICT COURT

16 CLARK COUNTY, NEVADA

17 LORI BRIDGES

18 Plaintiff,

19 v.

20 TARGET CORPORATION; DOES I through  
21 XX, and ROE BUSINESS ENTITIES I through  
22 XX, inclusive,

23 Defendants.

CASE NO: 2:24-cv-00320-RFB-BNW

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(FIRST REQUEST)**

24 Pursuant to Fed. R. Civ. P. 6, Fed. R. Civ. P. 26, LR 26-1 and LR 26-4, Plaintiff, LORI  
25 BRIDGES ("Plaintiff"), by and through her attorney of record, AUSTIN R. WOOD, ESQ. of the law  
26 firm RICHARD HARRIS LAW FIRM and Defendant, TARGET CORPORATION, by and through  
27 its attorneys of record, LOREN S. YOUNG, ESQ. and JULIE A. FUNAI, ESQ. of the law firm  
28 LINCOLN, GUSTAFSON & CERCOS, LLP, and hereby stipulate and agree to a sixty (60) day  
continuance of the current discovery deadlines to give the parties additional time to conduct discovery  
and discuss possible resolution.

**I. DISCOVERY COMPLETED**

1. Plaintiff, LORI BRIDGES served her FRCP 26(a)(1) Initial List of Witnesses and Documents on March 12, 2024.
2. Defendant, TARGET CORPORATION served its FRCP 26(A)(1) Initial Disclosure on March 8, 2024.

3. Defendant, TARGET CORPORATION served their Objection to Plaintiffs Initial List of Witnesses and Documents on March 26, 2024.
4. Defendant, TARGET CORPORATION propounded its First Set of Interrogatories and Requests for Production of Documents to Plaintiff on March 12, 2024.
5. Plaintiff served her responses to Defendant TARGET CORPORATION First Set of Interrogatories and Requests for Production of Documents April 11, 2024.
6. Plaintiff, LORI BRIDGES propounded her First Set of Interrogatories, Requests for Production of Documents, and Requests for Admission to Defendant TARGET CORPORATION on March 12, 2024.
7. Plaintiff, LORI BRIDGES served her First Supplement to FRCP 26(A)(1) Initial List of Witness and Documents on April 10, 2024.
8. Defendant served its responses to Plaintiff LORI BRIDGE's First Set of Interrogatories, Requests for Production of Documents and Requests for Admission on April 25, 2024.
9. Defendant TARGET CORPORATION served its First Supplemental Disclosures Pursuant to FRCP 26(a)(1) on April 25, 2024
10. Defendant TARGET CORPORATION served its Second Supplemental Disclosures Pursuant to FRCP 26(a)(1) on May 3, 2024.

## **II. DISCOVERY REMAINING TO BE COMPLETED**

1. Deposition of Plaintiff LORI BRIDGES
2. Depositions of percipient witness
3. Depositions of FRCP 30(b)(6) witnesses
4. Expert witness depositions
5. Initial and Rebuttal Expert Disclosures
6. Additional written discovery as needed

## **III. REASONS WHY DISCOVERY SHOULD BE EXTENDED**

The parties have been diligently engaged in discovery thus far and wish to engage in resolution discussions, including, but not limited to, a settlement conference. The parties wish to avoid unnecessary costs, fees and expenses in the interest of potential resolution, in light of completed

treatment and low damages. The parties are seeking a sixty (60) day continuance to allow the parties to discuss settlement, including exploring whether a settlement conference will be beneficial, and, if the efforts are unsuccessful, conducting the remaining discovery, including depositions and expert disclosures.

**PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY**

It is hereby stipulated that the discovery cutoff deadline be extended for a period of sixty (60) days. If approved, the new discovery deadlines would be modified as follows:

EVENT DEADLINE	CURRENT DATE	PROPOSED DATE
Close of Discovery	8/12/2024	10/11/2024
Motions to Amend Pleadings	5/14/2024	Closed
Initial Expert Disclosures	6/13/2024	8/12/2024
Rebuttal Expert Disclosures	7/12/2024	9/10/2024
Dispositive Motions	9/11/2024	11/10/2024
Joint Pre-Trial Order	10/11/2024	12/10/2024

**IT IS SO STIPULATED AND AGREED.**

DATED this 13<sup>th</sup> day of June, 2024.

DATED this 13<sup>th</sup> day of June, 2024.

**LINCOLN, GUSTAFSON & CERCOS, LLP**

**RICHARD HARRIS LAW FIRM**

*/s/ Loren S. Young*

*/s/ Austin Wood*

**LOREN S. YOUNG, ESQ.**

Nevada Bar No. 7567

**JULIE A. FUNAI, ESQ.**

Nevada Bar No. 8725

7670 W. Lake Mead Blvd., Suite 200

Las Vegas, Nevada 89128

Attorneys for Defendant,

TARGET CORPORATION

**AUSTIN WOOD, ESQ.**

Nevada Bar No. 16026

801 South Fort Apache Street

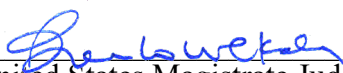
Las Vegas, Nevada 89101

Attorneys of Plaintiff,

LORI BRIDGES

**ORDER**

IT IS SO ORDERED.

  
United States Magistrate Judge

DATED: June 14, 2024

**From:** [Austin Wood](#)  
**To:** [Cheryl Giammona](#); [Alejandra Jimenez](#)  
**Cc:** [Julie Funai](#); [Kimberly Glad](#)  
**Subject:** RE: Bridges v. Target / SOED  
**Date:** Thursday, June 13, 2024 5:00:55 PM

---

You may affix my e-signature to the attached stipulation.

Best,

**Austin Wood**

Lawyer - Partner



Las Vegas	Reno
801 South 4th Street	6900 S. McCarran Blvd., #1010
Las Vegas NV 89101	Reno NV 89509
Ph. (702) 444-4444 x 138	Ph. (775) 222-2222



Please read the [Legal Disclaimer](#) that governs this email and any attachments.

---

**From:** Cheryl Giammona <CGiammona@lgclawoffice.com>  
**Sent:** Thursday, June 13, 2024 4:51 PM  
**To:** Austin Wood <austin@richardharrislaw.com>; Alejandra Jimenez <ajimenez@richardharrislaw.com>  
**Cc:** Julie Funai <JFunai@lgclawoffice.com>; Kimberly Glad <KGlad@lgclawoffice.com>  
**Subject:** Bridges v. Target / SOED

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Austin,

Attached please find the Stipulation and Order to Extend Discovery for you review. Please add any redlines if necessary or if we can provide your electronic signature.

Thank you!

**Cheryl Giammona**

*Legal Assistant to*

**Loren S. Young, Esq. – Managing Partner**

**Karissa K. Mack, Esq. – Partner**

**LINCOLN, GUSTAFSON & CERCOS LLP**

**Experience. Integrity. Results.**

California Nevada Arizona

---

101 West Broadway, Suite 1600  
San Diego, California 92101  
619.233.1150; 619.233.6949 Fax

7670 W Lake Mead Blvd, Suite 200  
Las Vegas, Nevada 89128  
702.257.1997; 702.257.2203 Fax

2415 E. Camelback Rd., Suite 700  
Phoenix, Arizona 85016  
602.606.5735; 602.508.6099 Fax

[www.lgclawoffice.com](http://www.lgclawoffice.com)

**The information contained in the text (and attachments) of this e-mail is privileged, confidential and only intended for the addressee(s). Nothing in this email or attachments is intended as tax advice and must not be relied upon in that regard. Please consult your tax advisors. You are not authorized to forward this email or attachments to anyone without the express written consent of the sender.**